

SEYFARTH SHAW LLP
 Michael J. Burns (SBN 172614)
 E-mail: mburns@seyfarth.com
 Michael T. McKeeman (SBN 173662)
 E-mail: mmckeeman@seyfarth.com
 Joseph J. Orzano (SBN 262040)
 E-mail: jorzano@seyfarth.com
 560 Mission Street, Suite 3100
 San Francisco, California 94105
 Telephone: (415) 397-2823
 Facsimile: (415) 397-8549

Attorneys for Big O Tires, LLC

LAGARIAS & BOULTER LLP
 Peter C. Lagarias (SBN 77091)
 E-mail: pcl@lb-attorneys.com
 Robert S. Boulter (SBN 153549)
 E-mail: rsb@lb-attorneys.com
 1629 Fifth Avenue
 San Rafael, California 94901-1828
 Telephone: (415) 460-0100
 Facsimile: (415) 460-1099

Attorneys for Sonoma Tires, Inc. and
 John G. Rhie, IV

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

SONOMA TIRES, INC., a California Corporation,)	Case No. C 11-0818 RS
)	
Plaintiff,)	STIPULATION REGARDING
)	LITIGATION DEADLINES AND
v.)	[PROPOSED] ORDER
)	[L.R. 7-12]
BIG O TIRES, LLC, a Colorado Limited Liability Company,)	
)	
Defendant.)	
)	
)	

Big O Tires, LLC (“Big O”), on the one hand, and Sonoma Tires, Inc. (“Sonoma”) and John G. Rhie, IV (“Rhie”), on the other hand, (collectively, “Parties”) by and through their respective undersigned counsel, hereby stipulate and jointly request that the Court issue an Order as follows:

1 WHEREAS, the parties current deadline to complete non-expert depositions is July 16,
2 2012;

3 WHEREAS, the parties have completed some but not all non-expert depositions in this
4 matter;

5 WHEREAS, the parties have met and conferred and, due to scheduling issues, desire to
6 complete all discovery, including depositions, by on or before August 3, 2012;

7 WHEREAS, the current scheduling order, as modified by the Court's May 4, 2012 Order,
8 provides adequate time to allow for the requested modification without extending the trial date;

9 **IT IS THEREFORE STIPULATED AND JOINTLY REQUESTED** that:

- 10 1. The Court order that the parties shall have up to and including August 3, 2012 to
11 complete non-expert discovery, including non-expert depositions;
12 2. The Court order that the parties shall have up to and including October 11, 2012
13 to have heard all pretrial motions, including but not limited to any motion for
14 summary judgment and/or summary adjudication; and
15 3. All other deadlines remain as set forth the Court's scheduling order.

16 **IT IS SO STIPULATED.**

17 SEYFARTH SHAW LLP

18 Dated: July 13, 2012

By /s/ Joseph J. Orzano
Joseph J. Orzano
Attorneys for Big O Tires, LLC

20 LAGARIAS & BOULTER, LLP

21 Dated: July 13, 2012

By /s/ Peter C. Lagarias
Peter C. Lagarias
Attorneys for Sonoma Tires, Inc. and
John G. Rhiel, IV

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[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED,

1. The parties shall have up to and including August 3, 2012 to complete non-expert discovery, including non-expert depositions;
2. All pretrial motions shall be heard no later than October 11, 2012; and
3. All other deadlines remain as set forth in the Court's scheduling order.

Dated: 7/13/12


The Honorable Richard S. Borg

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